



March 27, 2025

Via ECF

Hon. Vernon S. Broderick
 U.S. District Court, Southern District of New York
 Thurgood Marshall United States Courthouse
 40 Foley Square
 New York, NY 10007

Re: *United States v. Juan Carlos Padilla Santos*
 23-cr-650 (VSB)

Your Honor,

I represent Mr. Juan Carlos Padilla Santos in the above-referenced matter. I respectfully write to request an adjournment of Mr. Padilla Santos' sentencing hearing, currently scheduled for March 31, 2025, before Your Honor. As the Court is aware, I was appointed on February 12, 2025 following the withdrawal of prior counsel, Lance Lazarro, Esq. I am requesting additional time to prepare Mr. Padilla Santos' sentencing submission and to review the discovery materials.

I have conferred with the government, and this adjournment request is made on consent. Thus, I respectfully request that the Court adjourn the sentencing hearing to any date during the last week of May, at the Court's convenience.

Thank you.

Respectfully,

/s/ Gilbert S. Bayonne

Gilbert S. Bayonne, Esq.

**APPLICATION GRANTED
 SO ORDERED** *Vernon S. Broderick*
VERNON S. BRODERICK

U.S.D.J. 3/28/2025

The sentencing currently scheduled for March 31, 2025 is adjourned to May 29, 2025 at 10 AM.